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and Debtors in Possession*

14
15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 **Debtors.**

23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric Company
25 Affects both Debtors

26 * *All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

27 **STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EXTENDING
TIME TO RESPOND TO QUANTA
ASSUMPTION MOTION**
Re: Dkt. No. 1218

28 [No Hearing Requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee of Unsecured Creditors (the “**Creditors Committee**”) on the other. The Debtors and the Creditors Committee are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On April 3, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 Approving the Utility's Assumption of Certain Agreements with Quanta Energy Services, LLC*, filed by the Debtors on April 3, 2019 [Dkt. No. 1218] (the “**Quanta Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on April 24, 2019. Any response or opposition to the Quanta Assumption Motion is due by 4:00 p.m. (Pacific Time) on April 17, 2019.

B. Proposed counsel for the Creditors Committee has requested, and counsel for the Debtors has agreed, that the time for the Creditors Committee to respond to the Quanta Assumption Motion be extended.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time for the Creditors Committee to file and serve any response or opposition to the Quanta Assumption Motion is extended through 4:00 p.m. (Pacific Time) on April 19, 2019.

[Signatures on next page]

1 Dated: April 16, 2019
2 KELLER & BENVENUTTI LLP
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4 */s/ Jane Kim*
Jane Kim
5 *Attorneys for Debtors*
and *Debtors in Possession*
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Dated: April 16, 2019
MILBANK LLP
/s/ *Thomas R. Kreller*
Thomas R. Kreller
Proposed Attorneys for Official Committee
of Unsecured Creditors